

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ZENAIDA HERNANDEZ,

Plaintiff,

v.

MARIA E. MONTANEZ, MARK A. VERDINI,
JONATHAN W. THOMAS, CARLOS M.
GODEN, JR, and JANE DOE,

Defendants.

Civil Action No. 12-11062-FDS

DECLARATION OF DREW GLASSROTH

1. With Howard Friedman and David Milton, I am counsel for Plaintiff Zenaida Hernandez in this case. I am familiar with the facts and circumstances described herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff's First Set of Interrogatories to Defendants Montanez, Verdini, Thomas, Goden and Doe.

3. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiff's First Set of Requests for the Production of Documents to Defendants Montanez, Verdini, Thomas, Goden and Doe.

4. Attached hereto as Exhibit 3 is a true and correct copy of Defendant Verdini's Response to Plaintiff's First Set of Interrogatories.

5. Attached hereto as Exhibit 4 is a true and correct copy of Defendant Thomas's Response to Plaintiff's First Set of Interrogatories.

6. Attached hereto as Exhibit 5 is a true and correct copy of Defendant Montanez's Response to Plaintiff's First Set of Interrogatories.

7. Attached hereto as Exhibit 6 is a true and correct copy of Defendant Goden's Response to Plaintiff's First Set of Interrogatories.

8. Attached hereto as Exhibit 7 is a true and correct copy of Defendants' Response to Plaintiff's First Request for Production of Documents.

9. Attached hereto as Exhibit 8 is a true and correct copy of the redacted Souza-Baranowski Correctional Center Daily Shift Roster produced by Defendants in response to Document Request 2. Defense counsel stated to me during our March 7 telephone conference that Defendant Verdini's name is contained in the redacted portion of the document.

10. Attached hereto as Exhibit 9 is a true and correct copy of the redacted strip search log book produced by Defendants in response to Document Request 5.

11. Attached hereto as Exhibit 10 is a true and correct copy of an order dated September 11, 2012 in the case *Cocroft v. Smith*, No. 10-40257-TSH (D. Mass.).

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge.

/s/ Drew Glassroth
Drew Glassroth

Date: March 20, 2013

CERTIFICATE OF SERVICE

I certify that on this day a true copy of the above document was served upon the attorney of record for each party via ECF.

Date: March 20, 2013 /s/ Drew Glassroth
Drew Glassroth